

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ANDREW BRUNS IN SUPPORT OF DEFENDANT GOOGLE
LLC'S OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL 30(B)(6) TESTIMONY**

I, Andrew Bruns, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and am admitted to practice before this Court. I am an attorney at the law firm of Kecker, Van Nest & Peters LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Response to Plaintiff’s Motion For Expedited Briefing. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as **Exhibit A** is a true and correct copy of an excerpt from Ex. A to Singular’s Infringement Contentions, dated September 4, 2020.

4. Attached as **Exhibit B** is a true and correct copy of an email chain between Michael Ercolini and me, dated May 24, 2021.

5. Attached as **Exhibit C** is a true and correct copy of Google’s Objections and Responses to Singular’s Rule 30(b)(6) notice, dated May 12, 2021.

6. I participated in the parties’ meet and confer call on May 14, 2021. During that call, the parties found common ground on several deposition topics. Singular agreed to amend its Rule 30(b)(6) notice consistent with the parties’ conversation. In return, Google agreed to amend its responses. Google explained that it could not produce a witness to testify about a counterfactual world in which the Accused TPUs are not utilized in its data centers, as no such analyses or capital requests have been located. But Google agreed to produce a witness who could testify about the deployment of the accused TPU v2 and TPU v3 in its data centers, including related costs, savings, asset requests, and the like.

7. Attached as **Exhibit D** is a table cataloging Google’s responses to Singular’s Rule 30(b)(6) notice and those topics at issue in Singular’s motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 21, 2021 at Mill Valley, California.

/s/ Andrew Bruns

Andrew Bruns

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed